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**From:** John Woodling [jwoodling@rwah2o.org]  
**Sent:** Tuesday, June 08, 2010 8:27 AM  
**To:** Water Use Efficiency  
**Subject:** Cooments on SB7 technical methodologies

Thank you for the opportunity to serve on the Urban Stakeholder Committee (USC), and to comment on the draft technical methodologies for implementation of SBX7 7. I commend DWR staff for the effort put into developing the draft documents to guide discussion of the USC.

In general, the draft documents form a sound basis for further discussion of the issues and development of methodologies. As a general comment, the methodologies should strive to provide maximum flexibility to each urban retail water supplier to take the appropriate water efficiency measures for its service area that will contribute to the statewide goal. Where specific requirements are not identified in the law, DWR should err on the side of flexibility to allow the retailer to maximize water savings while minimizing costs.

Specific comments on each of the draft methodologies are included below:

Methodology 1 (Gross Water Use)

Page 1-2: DWR would define "distribution system" as including only those facilities that are downstream of a water supplier's drinking water treatment plant. While this may be the most consistent with standard practice, it also will create a large disincentive for agencies to invest money in tightening their raw water conveyance facilities, which in many cases may present the most cost-effective conservation opportunities. Because SBX7 7 does not define "distribution system," I would recommend that each water supplier should have the flexibility to define the extent of the distribution system to maximize its opportunities to cost effectively reduce water use.

Figure 1: While this figure is helpful in understanding the text, it does not adequately represent the diversity of water systems. Some water suppliers serve a number of disparate and geographically widely separated populations, with only an institutional, but not a physical linkage. The methodology should allow the water supplier to either consolidate or disaggregate these separate service areas for developing a plan for and tracking compliance.

Page 1-5, step 11: There is no justification for the proposed 4% industrial threshold, or the proposed 20% industrial/commercial threshold, for excluding "process water" as an element of gross water use. The water supplier should have the flexibility to determine what level of industrial and commercial use is significant for the purposes of excluding process water use. This approach will be self-regulating - the level of effort necessary to quantify the water use must be balanced against the volume of water that can be excluded form the conservation target.

## Methodology 2 (Service Area Population)

Page 2-6: Under the heading "*Obtain population by structure type*," the methodology states that to determine a per-connection population number for use in estimating total service area population, water suppliers will need to develop population-per-connection ratios for "individually metered residential connections" and "master-metered residential connections." These terms are then used throughout the document. There doesn't appear to be any reason why a connection should have to be metered for an agency to develop a population-per-connection ratio. I recommend the use of the terms "single family residential connection" and "multi-family residential connection" rather than "individually metered" and "master-metered."

## Methodology 4 (Compliance Daily Per Capita Water Use)

Page 4-2: Items 2.a and 2.b concerning the annexation of areas not previously connected to a municipal source are problematic. The text should be clarified so that it refers to areas that were in existence during the baseline period, but annexed during the compliance period. It would not make sense for areas annexed for new growth to have an immediate conservation savings target. In fact, these new growth areas provide an opportunity to reduce gpcd overall for the supplier's service area.

## Methodology 6 (Landscaped Area Water Use)

Pages 6-3 to 6-4: While DWR's paper says that the guidelines proposed for this methodology would only apply to Option 2, they clearly may affect the content of Option 4, depending on how that method develops. Accordingly, it is important that the guidelines proposed under "Methodology for Computation of Landscaped Area" be workable. It is not clear how workable options 1 and 2 on p. 6-3 are. In addition, there appears to be no reason why option 3 on p. 6-4 -- which would rely on sampling -- should be limited to smaller parcels. The draft methodology provides no justification for the 24,000 square foot cap on using sampling techniques, and could prove to be a significant burden on a supplier, with only a nominal improvement in accuracy.

## Methodology 7 (Baseline CII Water Use)

Page 7-2: Similar to Methodology 6, this methodology could affect the content of conservation option 4. DWR states no reason why a water supplier should have to have CII data for the entire baseline period. If the supplier has good CII data for its current use and can demonstrate that there were no significant differences in CII use during the baseline period (or can document the effect of such changes), then it should not be mandatory for the supplier to have hard data throughout the baseline period.

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